

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2017-370-E**

IN RE: Joint Application and Petition of South	)	
Carolina Electric & Gas Company and	)	
Dominion Energy, Inc. for review and	)	<b>INTERVENOR,</b>
approval of a proposed business	)	<b>TRANSCONTINENTAL GAS PIPE</b>
combination between SCANA	)	<b>LINE COMPANY, LLC'S</b>
Corporation and Dominion Energy, Inc.,	)	<b>FIRST REQUESTS FOR</b>
as may be required, and for a prudency	)	<b>PRODUCTION</b>
determination regarding the abandonment	)	<b>TO SOUTH CAROLINA ELECTRIC</b>
of the V.C. Summer Units 2 & 3 Project	)	<b>&amp; GAS COMPANY AND SCANA</b>
and associated customer benefits and cost	)	<b>CORPORATION</b>
recovery plan	)	

**TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY AND SCANA CORPORATION:**

Intervenor, **Transcontinental Gas Pipe Line Company, LLC**, (hereinafter as, "**Transco or Intervenor**"), pursuant to Reg. 103-833, hereby serves, **South Carolina Electric & Gas Company and SCANA Corporation, (hereinafter together as, "SCANA")** with Transcontinental Gas Pipe Line Company, LLC's First Requests for Production, to be answered separately within twenty (20) days from the date of service hereof. Please set forth SCANA's answers separately, after restating the question.

This Request for Production shall be deemed continuing, and if complete production to any of them is not presently available, and the information becomes available before trial, supplemental production is required at such time as this information becomes available to SCANA.

IF SCANA CONTENDS THAT ANY OF THE REQUESTED MATERIAL NEED NOT BE PRODUCED, IDENTIFY SUCH MATERIAL AND SET FORTH THE BASIS FOR SCANA's CONTENTION IN ACCORDANCE WITH RULE 26(b)(5) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

**INSTRUCTIONS**

**IT IS HEREIN REQUESTED:**

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.

3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Request be reproduced at the beginning of the response thereto.

7. That SCANA provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require SCANA to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. **If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim in a privilege log.**

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of SCANA, including information in the possession of SCANA or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for SCANA's inability to produce.

14. Please provide copies of any spreadsheets responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.

## **DEFINITIONS**

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **“You” or “your”** shall refer to, SCANA.
2. **The conjunctions “and” and “or” shall be interpreted** in each and every instance as meaning “and/or” and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.
3. **“Document”** shall mean all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in SCANA’s possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of SCANA and specifically includes the computer and or laptop computers utilized by Representatives of SCANA. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between Transco or Dominion Energy, Inc. and SCANA.
4. **“Dominion”** shall mean Dominion Energy, Inc. and any and all of its affiliates.
5. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

**FIRST REQUESTS FOR PRODUCTION**

1. From January 8, 2015, until the date of these presents, please provide all documents evaluating, analyzing, or discussing the contracts prepared by, or for, SCANA regarding natural gas transportation contracts and natural gas transportation contract renewals or replacements.
2. From January 8, 2015, until the date of these presents, please provide all documents that mention the provision of natural gas transportation and/or sales service to SCANA by Dominion or Transco or that mention the provision of natural gas transportation and/or sales service to SCANA by the Atlantic Coast Pipeline prepared in connection with the proposed merger between Dominion and SCANA that mention natural gas transportation and/or sales service to SCANA.
3. Please provide all SCANA management, management committee and board(s) of directors presentations since January 8, 2015, until the date of these presents, that are associated with gas supply and/or transportation service options for SCANA and other markets in South Carolina.
4. Please provide a copy of all presentations made by SCANA (or by others on behalf of SCANA) to credit or bond rating agencies since January 8, 2015, until the date of these presents and all documents that relate to such presentations, that include any information regarding gas supply and/or transportation service options for SCANA and other markets in South Carolina.
5. Please provide all presentation(s) made by SCANA to securities analysts and/or financial institutions since January 8, 2015, until the date of these presents and all documents that relate to such presentations, that include any information regarding gas supply and/or transportation service options for SCANA and other markets in South Carolina.
6. Please provide all documents since January 8, 2015, until the date of these presents, concerning or relating to the transportation service contracts between Transco and SCANA.
7. Please provide copies of all prior responses to discovery requests in this proceeding that relate to natural gas transportation and/or sales or service to SCANA or other markets located in South Carolina.
8. If You object to delineating those portions of prior discovery requests in “7” hereinabove, pertaining to “natural gas, transportation, and/or sales or service to SCANA”, please provide copies of all prior discovery requests, in full.

**[Signature Page Follows]**

/s/Jefferson D. Griffith, III

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Jefferson D. Griffith, III,

**AUSTIN & ROGERS, P.A.,**

508 Hampton Street, Suite 203

Columbia South Carolina, 29201

(803) 256-4000

Counsel for Intervenor, Transcontinental Gas Pipe  
Line Company, LLC.

September 20, 2018  
Columbia, South Carolina